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Attorneys for Plaintiffs
EDDIE KING, DEBBIE KING, BILLY RAY
PITCHER, and JOHN W. MALONEY

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

EDDIE KING, an individual; DEBBIE
KING, an individual; BILLY RAY
PITCHER, an individual; and JOHN W.
MALONEY, an individual,

Plaintiff,

Case No. 5:10-cv-04706 EJD HRL

**JOINT STIPULATION AND PROPOSED ORDER
GRANTING REQUEST OF COUNSEL FOR
PLAINTIFFS AND DEFENDANTS TO EXTEND
THE DEADLINES TO COMPLETE FACT
DISCOVERY AND FILE/SERVE DISPOSITIVE
MOTIONS FOR SIXTY DAYS.**

v.

SAM HOLDINGS, LLC, a limited liability company; HANDSON VENTURES, LLC, a limited liability company; RUSTIC CANYON LLC and HOV GLOBAL SERVICES LTD,

Defendants.

SAM HOLDINGS, LLC, a limited liability company,

Counter-Claimant,

v.

EDDIE KING, an individual; DEBBIE KING, an individual; BILLY RAY PITCHER, an individual; and JOHN W. MALONEY, an individual,

Counter-Defendants.

Judge: District Judge Edward J. Davila

**Fact Discovery Deadline:
October 19, 2011**

**Deadline to File/Serve Dispositive Motions:
October 31, 2011**

TO ALL PARTIES AND COUNSEL OR RECORD:

IT IS HEREBY STIPULATED by and between Plaintiffs, EDDIE KING, DEBBIE KING, BILLY RAY PITCHER and JOHN W. MALONEY (“Plaintiffs”), by and through their undersigned counsel, and Defendants, SAM HOLDINGS, LLC, HANDSON VENTURES, LLC, RUSTIC CANYON, LLC, and HOV GLOBAL SERVICES LTD (“Defendants”), by and through their undersigned counsel, that the existing deadlines to complete fact discovery and to file/serve dispositive motions be extended by sixty (60) days for the purpose of allowing each party to take additional depositions as follows:

1. The Court previously entered its *Stipulation And Order To Modify Case Management Scheduling Order* on August 10, 2011 modifying certain deadlines, including the deadlines to complete fact discovery and file/serve dispositive motions. [Docket No. 29]. The existing deadline to complete fact discovery is October 19, 2011, and the deadline to file/serve dispositive motions is October 31, 2011.

2. Counsel for all parties agree to extend the fact discovery deadline for sixty (60) days to allow for the taking of additional depositions that have not yet been taken and to take a second deposition of Peter Grossman if allowed. Counsel and parties have diligently pursued discovery and have taken many depositions. However, parties and witnesses are located in various geographical areas and there are additional depositions that need to be taken, additional documents to be produced, and interrogatories that remain outstanding.

3. Counsel for all parties further agree that the deadline for filing dispositive motions should be extended by sixty (60) days because the additional depositions and discovery will impact the need for and facts associated with any dispositive motions.

4. The Court previously vacated the trial date in this action and counsel do not expect that trial will take place for many months.

It is respectfully requested that the above requests for extension of Court ordered deadlines be granted and notice sent to all parties regarding the new deadlines to complete fact discovery and file/serve dispositive motions.

Respectfully submitted,

Dated: September 30, 2011

NELSON LAW GROUP

By: /s/ Robert S. Nelson
ROBERT S. NELSON

Dated: September 30, 2011

LONG LAW OFFICES

By: /s/ H. Clyde Long
H. CLYDE LONG

Attorneys for Plaintiffs EDDIE KING,
DEBBIE KING, BILLY RAY
PITCHER, and JOHN W. MALONEY

Dated: September 30, 2011

ERICKSEN ARBUTHNOT

By: /s/ Steve W. Dollar
STEVE W. DOLLAR

Dated: September 30, 2011

BOVIS, KYLE & BURCH, LLC

By: /s/ Melanie M. Norvell
MELANIE M. NORVELL
(*Appearing Pro Hac Vice*)

Attorneys for Defendants SAM
HOLDINGS, LLC, HANDSON
VENTURES, LLC, RUSTIC CANYON,
LLC and HOV GLOBAL SERVICES
LTD.

ORDER OF THE COURT

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: October 6, 2011



JUDGE, UNITED STATES DISTRICT COURT